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May 18, 2018

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil Isaza Tuzman to seek the Court's permission for out-of-state travel to attend memorial services for a friend, Francisco Triana Torres.

Mr. Triana Torres, like Mr. Isaza Tuzman, was a Harvard graduate of Colombian heritage, and former officer of the Phoenix-S.K.Club. Given their similar backgrounds and shared involvement with the Phoenix Club, Mr. Triana Torres and Mr. Isaza Tuzman became friends. Mr. Triana Torres, who resided in Cambridge, MA, tragically passed away on January 2, 2018, while visiting family and friends in Cartagena, Colombia, when a fourteen-story hotel balcony collapsed. His friends, family and colleagues are holding two memorial services for him in Cambridge at the end of May.

Mr. Isaza Tuzman respectfully requests the Court's permission to travel to Cambridge, MA, to attend these memorial services. Mr. Isaza Tuzman would travel to and from Cambridge on the following schedule:

- Morning of Friday, May 25: travel by car to Massachusetts from the Southern District;
- Evening of Friday, May 25: attend memorial service for close family and friends at 72 Mount Auburn Street in Cambridge, MA;
- Saturday, May 26: attend a general memorial service at St. Paul's Church at 29 Mount Auburn Street, Cambridge, MA; return by car to the Southern District.

On the night of May 25, Mr. Isaza Tuzman would stay at a local hotel or at his sister Intiya's apartment in Boston.

GIBSON DUNN

May 18, 2018

Page 2

If this request is granted, all other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

This request has been communicated to Pretrial Services, which has no objection to this travel. AUSA Naftalis has communicated that the prosecutors oppose this request.

Mr. Isaza Tuzman has previously requested permission from the Court to travel to Pennsylvania and Massachusetts, including to attend a memorial service, which requests the Court has granted. *See* ECF Nos. 93, 123, 125, 441, 758. Each time Mr. Isaza Tuzman has travelled outside this District as permitted by the Court, he has left from and returned to this District as scheduled and without incident.

We thank the Court in advance for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)